

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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SARAH H. BLACK,  
DANIEL L. BLACK, and JACOB L. BLACK,

Plaintiff,

v.

ANTHONY DAIN, CHERIE WRIGLEY, IRA  
SALZMAN, MELISSA COHENSON, BRIAN A.  
RAPHAN, P.C., PAMELA KERR, ESAUN G.  
PINTO, and CPI INVESTIGATIONS

Defendants.  
-----X

Civil Action No.: 1:16-cv-01238  
(CBA) (ST)

**DECLARATION OF  
DEFENDANT IRA SALZMAN IN  
SUPPORT OF THE  
DEFENDANT'S MOTION TO  
DISMISS THE PLAINTIFFS'  
AMENDED COMPLAINT**

STATE OF NEW YORK     )  
                                  ) ss.:  
COUNTY OF NEW YORK    )

**IRA SALZMAN**, being duly sworn, deposes and says:

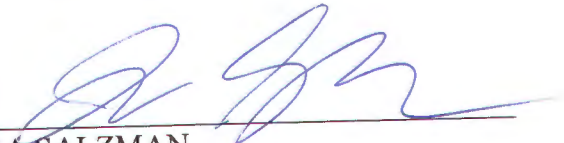
1. I am a defendant in the above-referenced action, and I am fully familiar with the matters hereinafter set forth. I respectfully submit this Declaration in support of my motion to dismiss the Plaintiffs' Amended Complaint pursuant to Fed. R. Civ. P. 12(b)(6), for failure to state a claim upon which relief may be granted, and upon other grounds.

2. A true and correct copy of the September 28, 2015 Order of the Honorable Judge Elizabeth D. Leith of the Denver, Colorado Probate Court is annexed hereto as Exhibit "A."

3. A true and correct copy of the February 25, 2016 Order of the Honorable Judge Elizabeth D. Leith of the Denver, Colorado Probate Court is annexed hereto as Exhibit "B."

4. A true and correct copy of the March 17, 2016 Order of the Honorable Judge Elizabeth D. Leith of the Denver, Colorado Probate Court is annexed hereto as Exhibit "C."

5. A true and correct copy of the April 12, 2016 Interim Order of the Honorable Judge Thomas P. Aliotta, J.S.C. of the Supreme Court of the State of New York, Richmond County, is annexed hereto as Exhibit "D."

  
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IRA SALZMAN

Sworn to before me this 25th day of July, 2016

  
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NOTARY PUBLIC

DAVID CHOYNE  
Notary Public, State of New York  
No. 02CH6210004  
Qualified in New York County  
Commission Expires August 10, 2017